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12
13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 NATIONAL FEDERATION OF THE BLIND,
on behalf of its members and itself; ALAN
16 SCHLANK; BILLIE RUTH SCHLANK;
JOYCE PRATT; and MARK ADREON, on
17 behalf of themselves and all others similarly
situated,

18 Plaintiffs,

19 v.

20 CLARK COUNTY, NEVADA; CLARK
21 COUNTY BOARD OF COMMISSIONERS;
and CLARK COUNTY DEPARTMENT OF
22 AVIATION d/b/a McCARRAN
INTERNATIONAL AIRPORT,

23 Defendants.

24 CASE NO.: 2:11-cv-00474-LDG-PAL

25
26 **STIPULATION AND ORDER
REGARDING DEFENDANTS'
MOTION TO DISMISS COMPLAINT
(DKT. NO. 24); DEFENDANTS'
MOTION FOR LEAVE TO FILE
SUPPLEMENT TO MOTION TO
DISMISS COMPLAINT (DKT. NO. 25);
AND DEFENDANTS' MOTION TO
EXCEED PAGE LIMIT (DKT. NO. 26);
STIPULATION AND ORDER TO
EXTEND BRIEFING SCHEDULE
(FIRST REQUEST)**

27 Defendants Clark County, Nevada, Clark County Board of County Commissioners, and
28 the Clark County Department of Aviation d/b/a McCarran (collectively the "County"), by and

1 through their attorneys of record the law firm of Brownstein Hyatt Farber Schreck LLP and the
2 Clark County District Attorney's Office, and Plaintiffs National Federation of the Blind, Alan
3 Schlank, Billie Ruth Schlank, Joyce Pratt, and Mark Adreon (collectively the "NFB Plaintiffs"),
4 by and through their attorneys of record Alverson Taylor Mortensen & Sanders, Disability Rights
5 Advocates, and Brown Goldstein & Levy LLP, hereby stipulate as follows:

- 6 1. WHEREAS the County filed its Motion to Dismiss Complaint (Dkt. No. 24) ("Motion to
7 Dismiss") on April 25, 2011.
- 8 2. WHEREAS the County filed its Motion for Leave to File Supplement to Motion to Dismiss
9 Complaint (Dkt No. 25) ("Motion to Supplement") on April 29, 2011, which included Exhibit
10 "A" - "Proposed Supplement to Motion to Dismiss Complaint" ("County's Supplement").
- 11 3. WHEREAS the County also filed its Motion to Exceed Page Limit (Dkt. No. 26) ("Motion to
12 Exceed Limit") on April 29, 2011.
- 13 4. WHEREAS the County and the NFB Plaintiffs agree that the County's Motion to Supplement
14 should be granted by the Court such that the County's Supplement should be included and
15 considered as part of the County's Motion to Dismiss.
- 16 5. WHEREAS the County and the NFB Plaintiffs agree that the County's Motion to Exceed
17 Limit should be granted by the Court because the County was justified in exceeding Local
18 Rule 7-4's page limit.
- 19 6. WHEREAS the County and the NFB Plaintiffs agree that the NFB shall have additional time
20 than that provided in Local Rule 7-2(d) to file a consolidated opposition brief to the County's
21 Motion to Dismiss, which includes the County's Supplement. The County and the NFB
22 Plaintiffs agree that NFB Plaintiffs will file one consolidated opposition brief on or before
23 June 7, 2011.
- 24 7. WHEREAS the County and the NFB Plaintiffs agree that the NFB Plaintiffs may file their
25 own motion to exceed the page limit in Local Rule 7-4 with regard to their consolidated
26 opposition brief.
- 27 8. WHEREAS the County and the NFB Plaintiffs agree that the County shall file one
28 consolidated reply brief in support of the County's Motion to Dismiss, which now includes

1 the County's Supplement, and this consolidated reply brief shall be filed on or before June
 2 28, 2011.

3 9. WHEREAS the County and the NFB Plaintiffs agree that the NFB Plaintiffs shall have up to
 4 and including May 23, 2011, to amend their Complaint.

5 10. WHEREAS the County and the NFB Plaintiffs agree on and approve the form and content of
 6 the Proposed Order which follows this Stipulation.

7 Dated this 11th of May, 2011.

8 /s/ Tamara Beatty Peterson
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Order

Having reviewed the foregoing stipulation and good cause appearing,

3 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that “Motion for Leave to
4 File Supplement to Motion to Dismiss Complaint (Dkt No. 25) and Motion to Exceed Page Limit
5 (Dkt. No. 26) are hereby GRANTED.

6 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the County's
7 "Proposed Supplement to Motion to Dismiss Complaint" (Dkt. No. 25, Ex. A) ("County"
8 Supplement") shall now be deemed as a supplement and, thus, part of the County's Motio
9 Dismiss Complaint (Dkt. No. 24).

10 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the County's Motion
11 to Dismiss Complaint (Dkt. No. 24), which now includes the County's Supplement, is permitted
12 to exceed the page limit provided for in Local Rule 7-4.

13 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the NFB Plaintiffs
14 shall file one consolidated opposition brief to the County's Motion to Dismiss, and the County's
15 Supplement thereto, on or before **June 7, 2011**.

16 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the County shall file
17 one consolidated reply brief in support of the County's Motion to Dismiss, and supplement
18 thereto on or before **June 28, 2011**.

19 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the NFB Plaintiffs
20 shall have up to and including **May 23, 2011**, to amend their Complaint.

21 IT IS SO ORDERED

UNITED STATES DISTRICT JUDGE

DATED: 13 May 2011